

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

SMARTFLASH LLC, et al.,

Plaintiffs,

v.

**SAMSUNG ELECTRONICS CO.,
LTD., et al.,**

Defendants.

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Case No. 6:13-cv-00448-JRG-KNM

JURY TRIAL DEMANDED

HTC'S AMENDED TRIAL WITNESS LIST

Defendants HTC Corporation, HTC America, Inc., and Exedea, Inc. (collectively, "HTC") file this amended trial witness list (attached as Exhibit A) for identification and categorization of trial witnesses.

Date: May 15, 2015

Respectfully Submitted,

By: /s/ Philip A. Morin (with permission)

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INC.**

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on May 15, 2015.

/s/ Kevin A. Smith

EXHIBIT A

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HTC'S AMENDED TRIAL WITNESS LIST

Defendants HTC Corporation, HTC America, Inc., and Exedea, Inc. (collectively, “HTC”) hereby identify the trial witnesses they may call live or by deposition. HTC’s identification of witnesses is based on its assessment of the case at this time. HTC also does not know the nature and/or scope of the testimony and evidence that Plaintiffs Smartflash LLC and Smartflash Technologies Limited intend to present. Accordingly, HTC reserves the right to modify, amend and/or supplement these disclosures based on case developments, including but not limited to the right to: (i) not call some of the witnesses identified; (ii) calling live or by deposition any witness identified on the witness list provided by Smartflash as well as any witnesses necessary to authenticate or lay the foundation for the introduction of documents to which any opposing party objects (including but not limited to custodians of records); (iii) disclose additional witnesses to testify live or by deposition; and/or (iv) introduce deposition testimony as impeachment evidence. HTC further notes that its identification of any witness herein is not an admission that the witness’ testimony would be admissible if proffered by Smartflash. HTC reserves the right to cross-examine any witness called to testify by any

opposing party or any other party, regardless of whether they are disclosed on this witness list, including without limitation by counter-designation of proffered deposition testimony.

Witness	Topic	Will/May/May But Likely Will Not Call	Deposed
Ben Goldberg Contact through counsel for HTC	The subject matter of his expert reports	Will Call	Deposed
Ficus Kirkpatrick Contact through counsel for Google	Issues related to non-infringement, damages	Will Call	Deposed
Jason Mackenzie Contact through counsel for HTC	Issues related to non-infringement, damages, no willfulness, unenforceability	Will Call	Deposed
David Reibstein Contact through counsel for HTC	The subject matter of his expert reports	Will Call	Deposed
Michael Siliski Contact through counsel for Google	Issues related to non-infringement, damages	Will Call	Deposed
Brian Napper Contact through counsel for HTC	The subject matter of his expert report	Will Call	Deposed
Andrew Wolfe Contact through counsel for HTC	The subject matter of his expert reports	Will Call	Deposed
Tom Connelly Contact through counsel for Google	Issues related to damages	May Call	Deposed
Daniel Hou Contact through counsel for HTC	Issues related to non-infringement, damages	May Call	Deposed
Jerry Hsiao Contact through counsel for HTC	Issues related to non-infringement, damages	Will call by deposition	Deposed

Witness	Topic	Will/May/May But Likely Will Not Call	Deposed
Jeff Lotspiech jeff@lotspiech.com	Issues related to invalidity	May Call	Deposed
Raymond Pao Contact through counsel for HTC	Issues related to non- infringement, damages	May Call	Deposed
Dennis Yang Contact through counsel for HTC	Issues related to non- infringement, damages	May Call	Deposed
Lynn Yu Contact through counsel for HTC	Issues related to non- infringement, damages, no willfulness	May Call	Deposed
Hsiu Lai Contact through counsel for HTC	Issues related to damages	May But Likely Will Not Call	Deposed
Witnesses identified in Defendants' Deposition Designations	Topics identified in Defendants' deposition designations	Will call	Deposed

Date: May 15, 2015

Respectfully Submitted,

By: /s/ Philip A. Morin (with permission)

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/s/ Kevin Smith